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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,

Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION FOR ENTRY
OF AN ORDER AUTHORIZING THE DEBTORS TO PARTIALLY REDACT
AMENDED AIRCRAFT LEASES**

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”), and in accordance with the United States Bankruptcy Court’s case management procedures set forth in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on July 8, 2020 [ECF No. 79] (the “**Case Management Order**”), the undersigned hereby certifies as follows:

1. On August 20, 2021, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Debtors’ Motion for Entry of an Order Authorizing the*

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

Debtors To Partially Redact Amended Aircraft Leases [ECF No. 1612] (the “**Motion**”). Objections and responsive pleadings to the Motion were due no later than August 31, 2021 at 12:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”).

2. The Case Management Order and Local Rule 9075-2 provide that pleadings may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable deadline and (b) the attorney for the entity that filed the pleading complies with the relevant procedural and notice requirements.

3. As of the filing of this certificate, more than 48 hours since the Objection Deadline have elapsed and, to the best of my knowledge, no objection or responsive pleading to the Motion has been (a) filed with the Court on the docket of the above-captioned chapter 11 cases or (b) served on the Debtors or their counsel.

4. Accordingly, the Debtors respectfully request that the Court enter the proposed order, a copy of which is attached hereto as **Exhibit A**, granting the Motion in accordance with the procedures set forth in the Case Management Order.

[Remainder of page intentionally left blank]

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: September 2, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

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Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., *et al.*,
Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**ORDER AUTHORIZING THE DEBTORS TO
PARTIALLY REDACT AMENDED AIRCRAFT LEASES**

Upon the motion (the “**Sealing Motion**”)² of the Debtors for entry of an order (this “**Order**”), authorizing the Debtors to file under seal the Amended 43706 Aircraft Lease and the summaries of the Amended Aircraft Leases, as set forth more fully in the Sealing Motion and the Landess Declaration; and the Court having jurisdiction to consider the Sealing Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Sealing Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue of the Chapter 11 Cases and related proceedings being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Sealing Motion having been provided to the notice parties identified in the Sealing Motion; such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Sealing Motion.

the Court having reviewed the Sealing Motion and considered the relief requested therein; and upon all of the proceedings had before the Court; and after due deliberation the Court having determined that the legal and factual bases set forth in the Sealing Motion establish just cause for the relief granted herein; and the Court having found that the relief granted herein is in the best interests of the Debtors, their creditors, and all other parties in interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Sealing Motion is granted as set forth herein.
2. The Debtors are authorized to (a) file partially redacted versions of the Amended 43706 Aircraft Lease and the summaries of the Amended Aircraft Leases on the public docket of the Chapter 11 Cases and (b) submit unredacted versions of the Amended 43706 Aircraft Lease and the summaries of the Amended Aircraft Leases to the Clerk of the Court, along with a copy of this Order, clearly labeled “TO BE FILED UNDER SEAL.”
3. The unredacted copies of the Amended 43706 Aircraft Lease and the summaries of the Amended Aircraft Leases shall remain confidential and shall not be made available to anyone without the prior written consent of the Debtors other than the U.S. Trustee and the respective advisors to the Committee, the DIP Lenders, and the Ad Hoc Group on a “Professionals Eyes Only” basis.
4. The Debtors and any party authorized to receive unredacted copies of the Amended 43706 Aircraft Lease and the summaries of the Amended Aircraft Leases pursuant to this Order shall be authorized and directed, subject to Rule 9018-1(c) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, to redact specific references to information included in the Amended 43706 Aircraft Lease

or the summaries of the Amended Aircraft Leases from any pleadings filed on the public docket of the Chapter 11 Cases.

5. Entry of this Order is without prejudice to the rights of any party in interest in the Chapter 11 Cases or the U.S. Trustee to seek an order of this Court unsealing all or part of the Amended 43706 Aircraft Lease, the summaries of the Amended Aircraft Leases, or Confidential Information.

6. The Clerk of the Court is authorized to destroy the Amended 43706 Aircraft Lease and the summaries of the Amended Aircraft Leases at the conclusion of the Chapter 11 Cases.

7. The Debtors are authorized to take, or refrain from taking, any action necessary or appropriate to implement and effectuate the terms of, and the relief granted in, this Order without seeking further order of the Court.

8. While the above referenced Chapter 11 Cases are pending, this Court shall retain the exclusive jurisdiction over any and all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2021
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE